

C. Frank Harscher, III

SECRETARY



Roger Blair

JULIAN M. CARROLL
GOVERNOR

Site: A. L. Taylor
Break: 2.4
Other:

COMMONWEALTH OF KENTUCKY
DEPARTMENT FOR NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION
BUREAU OF ENVIRONMENTAL PROTECTION

A. L. ROARK
COMMISSIONER
FRANKFORT, KENTUCKY 40601

RECEIVED
SEP 12 1979

MEMORANDUM

TO: Members of the Hazardous Waste Policy Task Force
FROM: Jack A. Wilson, Deputy Commissioner
Bureau of Environmental Protection
DATE: September 11, 1979

DIV. OF HAZARDOUS MATERIAL
AND WASTE MANAGEMENT

Roger Blair has completed his outline for the Valley of the Drums Cleanup Plan - Phase I. That outline is attached for your review. I have scheduled a Task Force Meeting for 9 a.m. on Friday, September 14, in the fifth floor conference room. The purpose of the meeting will be to discuss the plan outline, confirm division and office assignments for the plan segments and develop a schedule for plan development and implementation. Please be prepared to make commitments on resources and time.

JAW:jz

Attachment



10951511

000171

same Draft / each item by
September 2, 1979

VALLEY OF THE DRUMS CLEAN-UP PLAN DEVELOPMENT PHASE I

1. STATEMENT OF PROBLEM

- a. Historical summary of events to date along with a general description of the problems magnitude, the policy issues that must be addressed, and the known elements that impact on the solution. (Division of Hazardous Material and Waste Management)
- b. Site plan of area drawn to scale and depicting all physical features such as drum locations by type, treatment facility, diversion ditches, roads, buildings, suspected subsurface storage areas, and monitoring points. (Division of Hazardous Material and Waste Management) *assistance on air, water for monitoring points*
- c. Evaluation of monitoring data with a summary of the results as compared to known standards and an assessment of the danger. (Division of Water Quality)
- ✓ d. Legal parameters bearing on the problem with a discussion of the rights and interests of Mrs. Taylor, generators, DNREP, and citizens of Bullitt County. (Office of General Counsel)
- e. An exploration of the various funding sources that may be available along with some estimate of the amount. (Office of Policy and Program Analysis)
- f. An evaluation of the past public relations aspects of the site along with some general guidelines for future consideration. (Office of Communication and Community Affairs)

Get copy of
Transcript for
Hazardous

serial
photograph

~ 2 days

EPA is
also working
on a report

what is the most value of
objects?

2. PLAN DEVELOPMENT

- a. Develop sampling scheme to be used in evaluating contents of all barrels. The sampling scheme should seek to minimize cost and effort while optimizing our assurance as to the contents. (Division of Hazardous Material)
- b. Based on the best estimate of probable materials, develop disposal strategy and techniques. (Divisions of Hazardous Material, Air Quality, Water Quality, and Sanitary Engineering)
- c. Based on (b), identify alternative disposal sites that would be suitable for handling the waste materials. Select preferred sites. (Division of Hazardous Material)
- d. Based on (b) and (c) develop a transportation strategy. Identify possible sources and modes of transportation, including other state agencies, and the attendant costs. Select recommended alternative. (Management Services and Operations)

Available
for the
storage container,
Pneumobles

Outline
to return

prepare a
list of items
not to be permitted
to leave

- e. Develop reclamation plan for cleared site. The plan should include an estimate of the required earthwork, equipment, fencing, signs, shrubs, trees, seed, mulch, and fertilizer to effect successful reclamation. As a minimum, the completed plan will have a site plan, with contours, which depicts the final contours and drainage patterns; detailed cost estimate; and detailed equipment list. *(Division of Hazardous Material)*

- f. Develop a plan for periodic evaluation of the treatment plant's effectiveness along with a complete maintenance schedule. Compile cost figures associated with evaluation and maintenance. *(Division of Water Quality)*

- g. Develop a monitoring plan for long term evaluation of the reclaimed site. Monitoring plan should include sampling of water, fish, vegetation, and drinking water supplies. Further, sampling and analytic methodologies should be defined along with assigning responsibilities for various work items and developing cost data for carrying out the plan. *(Divisions of Hazardous Material, Water Quality, and Sanitary Engineering)*

- h. Develop legal strategy for plan accomplishment. Outline, in detail, the various legal steps that will be necessary for the plan to proceed smoothly. *(Office of General Counsel)*

- i. Develop public relations strategy including a scheme for involving local officials and citizens, if appropriate, in the clean-up program. *(Office of Communication and Community Affairs)*

- j. Develop contingency plans to deal with clean-up-related accidents. *(Special Investigations and Emergency Response)*

- k. Based on all the above develop total cost figures and a critical path chart for the entire project. *(Division of Hazardous Material)*

- l. Determine internal and external coordination required to accomplish plan. Identify key individuals that must be contacted. *(Bureau of Environmental Protection)*

- m. Identify potential sources for work accomplishment and make preliminary inquiries. *(Bureau of Environmental Protection)*

- n. Determine funding sources and identify mechanisms for obtaining the funds. *(Office of Policy and Program Analysis)*

3. PLAN IMPLEMENTATION

- a. Sample and analyze drums. (*Divisions of Hazardous Material and Water Quality*)
- b. Review disposal strategy and sites based on actual sample results. Modify as necessary. (*Divisions of Hazardous Material, Water Quality, Air Quality, and Sanitary Engineering*)
- c. Initiate coordinating process with all individuals, agencies, and private companies that will plan a role in the clean-up. (*Bureau of Environmental Protection*)
- d. Clear legal obstacles. (*Office of General Counsel*)
- e. Finalize cost estimates. (*Division of Hazardous Material*)
- f. Obtain funds. (*Office of Administrative Services*)
- g. Prepare project specifications. (*Division of Hazardous Material*)
- h. Take bids and award contract. (*Bureau of Environmental Protection*)
- i. Project management. (*Division of Hazardous Material*)
- j. Final project report and evaluation. (*Division of Hazardous Material*)
- k. Operate monitoring program. (*Divisions of Hazardous Material and Water Quality*)
- l. Maintain water treatment facility. (*Division of Water Quality*)
- m. Begin development of Phase II. (*Division of Hazardous Material*)